

## REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action, claims 1-8 were pending and rejected. In this response, no claim has been canceled. Claims 2-8 have been amended. In addition, new claims 22-34 have been added. Thus, claims 1-8 and 22-34 remain pending. No new matter has been added.

Claims 1-8 are rejected under 35 U.S.C. 102(e) as anticipated by U.S. Patent No. 6,410,990 of Taylor et al. ("Taylor"). It is respectfully submitted that claims 1-8 and 22-34 include limitations that are not disclosed by Taylor. Specifically, independent claim 1 recites as follows:

1. A semiconductor device, comprising:
  - a die having a first edge and a core;
  - a plurality of bond pads configured in an array between the first edge and the core;
  - a first plurality of driver cells located between the first edge and the plurality of bond pads; and
  - a second plurality of driver cells located between the plurality of bond pads and the core.

(Emphasis added)

Independent claim 1 includes a die having an edge and a core, where multiple bond pads are disposed as an array between the edge and the core. First driver cells are disposed between the edge and the bond pads and second driver cells are disposed between the bond pads and the core. It is respectfully submitted that the above limitations are absent from Taylor.

Rather, Taylor is related to an integrated circuit having multiple wire bond pads located along a horizontal axis and vertical axis (see, Figs. 1A and 1B, Abstract). However,

integrated circuit 300 shown Fig. 1B of Taylor referred by the Examiner is not a die. Rather, the integrated circuit 300 of Taylor is merely an integrated circuit board that a die, such as package 360 as shown in Fig. 3C of Taylor, may be disposed thereon using flip-chip technology. In order to anticipate a claim, each limitation of the claim must be taught by the cited reference. It is respectfully submitted that Taylor fails to disclose or suggest the limitations set forth above.

Even if the integrated circuit 300 of Taylor may be considered as a die, such an integrated circuit still lacks the limitations set forth above. For example, referring to Fig. 1B of Taylor, the Examiner referred the region to the right of 344 (e.g., 360) as a core as claimed in the present invention (see, 3/26/2004 Office Action, page 2). However, such region is referred to as a power bus (see, col. 3, lines 1 to 37 of Taylor). Also, the Examiner interpreted the right of 344 of Taylor as the first driver cells and 340 of Taylor as the second driver cells (see, 3/26/2004 Office Action, page 2). However, both 344 and 340 are described as two rows of C4 connections. There is no mention or suggestion that such pads are driver cells in Taylor. Furthermore, the Examiner rejected most of the remaining claims as anticipated by Taylor without pointing out where and how those claims are anticipated by Taylor. It is respectfully submitted that Taylor fails to disclose or suggest at least the limitations set forth. Therefore, for the reasons discussed above, it is respectfully submitted that independent claim 1 is not anticipated by Taylor.

Given that the dependent claims 2-8 and 22-34 depend from claim 1, at least for the reasons similar to those discussed above, it is respectfully submitted that claims 2-8 and 22-34 are patentable over Taylor. Withdrawal of the rejections is respectfully requested.

In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date:

8/16/01



Michael J. Mallie  
Attorney for Applicant  
Reg. No. 36,591

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, California 90025-1026  
(408) 720-8300